

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**COMMONWEALTH OF
PENNSYLVANIA,**

Plaintiff,

v.

NO. 2:17-cv-04540-WB

DONALD J. TRUMP, *et al.*,

Defendants.

**COMMONWEALTH OF PENNSYLVANIA’S UNOPPOSED MOTION FOR LEAVE
TO EXCEED THE COURT’S THIRTY PAGE LIMIT ON BRIEFS**

The Commonwealth of Pennsylvania respectfully files this Unopposed Motion for Leave to Exceed the Court’s Thirty (30) Page Limit on Briefs and, in support thereof, states as follows:

1. The Commonwealth filed a Complaint for Declaratory and Injunctive Relief on October 11, 2017. That Complaint asserted five counts and contained 176 paragraphs.

2. The Complaint alleges that two regulations recently issued by Defendants in this case violate several constitutional and statutory provisions, including the Administrative Procedure Act, the Affordable Care Act, the Civil Rights Act, and the First and Fifth Amendments to the United States Constitution.

3. Along with this Motion, the Commonwealth is filing a Motion for a Preliminary Injunction, which alleges that Defendants have violated these statutory and constitutional provisions and that Plaintiff will suffer irreparable harm as a result.

4. In order to provide the necessary factual and legal information necessary for this Court to render an appropriate decision on the Motion, the Commonwealth requires more than 30 pages for its brief.

5. The Commonwealth attaches hereto, as Exhibit A, its Memorandum of Law in Support of its Motion for Preliminary Injunction. That memorandum is 49 pages in length.

6. The undersigned counsel has attempted in good faith to adhere to this Court's page limit, but was unable to do so in light of the number of facts and the complexity of legal issue presented by this case. In the attached Memorandum of Law, Counsel has endeavored to present the arguments in support of the Commonwealth's Motion as succinctly as possible.

7. Counsel for defendants has informed the undersigned counsel that defendants do not oppose this motion.

WHEREFORE, the Commonwealth respectfully requests that the Court grant this Motion, allow the Commonwealth to exceed the Court's thirty (30) page limit, and accept as filed the Commonwealth's Memorandum of Law in Support of the Motion for Preliminary Injunction, attached hereto as Exhibit A, as of the date the Court enters the attached Order.

Respectfully submitted,

JOSH SHAPIRO
Attorney General
Commonwealth of Pennsylvania

November 2, 2017

/s/ Jonathan Scott Goldman
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CERTIFICATE OF SERVICE

I hereby certify that I have caused the foregoing document, and any attachments thereto, to be electronically filed with the Clerk of the Court for the United States District Court for the Eastern District of Pennsylvania by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Dated: November 2, 2017

/s/ Jonathan Scott Goldman
JONATHAN SCOTT GOLDMAN